

## REMARKS

Claims 1-16 are pending. Claims 6 and 12 are objected to for informalities in punctuation. Claims 1, 2, 5-6, 10, 12, and 13 are rejected under 35 USC 102(e) as being anticipated by Kfoury et al (US 2003/0044000). Claims 3, 4, 7-9, and 11 are rejected under 35 USC 103(a) as being unpatentable over Kfoury et al. Claims 9 and 14-16 are rejected under 35 USC 103(a) as being unpatentable over Kfoury et al. in view of Liebenow et al. (US 6,909,424).

Claims 1, 2, 4, 6, 7, 9, 10, 12, and 14 are amended herein. Claim 5 is cancelled. Claims 17 and 18 are new. Claims 1 - 4 and 6 - 18 are presented for examination. Claims 1, 10, and 17 are independent.

### Response to formal objections

The informalities in punctuation in claims 6 and 12 are corrected herein.

### Response to rejections under 35 USC 102(e)

All independent claims 1, 10, and 17 recite a selection circuit that identifies which projection is being pressed the hardest when two or more projections are pressed simultaneously. This amendment is supported on Applicant's page 10, last line, through page 11, lines 1-5. Kfoury does not provide a selection circuit that resolves simultaneously pressed keys. Such function or circuit is not mentioned in paragraph [0023] of Kfoury cited by Examiner.

Independent claims 10 and 17 also recite a projection array that is equally usable with a right or left hand without rotation or reversal of the array. Support for this amendment and for the hand grip details in new claim 17 are found in Applicant's FIGs 1-3 and on page 7, line 7 through page 8, line 19 of the specification. Kfoury's keypad physically rotates to adapt between right or left-handed use. See Kfoury's left-handed

orientation in FIG 2, his right-handed orientation in FIG 3, and his paragraph [0038] describing why his keypad is not equally usable with a right or left hand without rotation.

Claim 9, 10, and 18 also recite a visual representation of the identified projection being displayed in a position on a screen corresponding to the location of the identified projection relative to the other projections. This element is not found in Kfoury, as noted by Examiner on page 9, paragraph 2 of the action.

For the above reasons Kfoury does not support a 35 USC 102 rejection of claims 1, 9, 10, 17, or 18 as required by MPEP 706.02(a) IV: " . . . for anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present."

#### Response to rejections under 35 USC 103 (a)

The proposed combination of Kfoury with Liebenow does not produce the present invention of independent claims 1, 10, and 17, because neither Kfoury nor Liebenow have a selection circuit that resolves simultaneously pressed keys. Such function or circuit is not mentioned in paragraph [0023] of Kfoury cited by Examiner.

Furthermore, the proposed combination of Kfoury with Liebenow does not produce the present invention of claims 10 or 17, because neither Kfoury nor Liebenow have a keypad that is equally usable by a left or right hand without rotation or reversal of the keypad. Kfoury provides a keypad that physically rotates to adapt between right and left-handed use as discussed above. Liebenow provides a keypad 232 that must be reversed for alternate hands.

FIG 8 of Liebenow is described in his column 8, lines 41-44: "Alternately, for users desiring to hold the digital information in the left hand, the keypad 232 may be rotated so the bottom row of keys of the keypad 232 is adjacent to the left side surface 210 of the housing 202". Adaptation of Liebenow's touch sensitive panel 240 of FIG 9 for left

handed use is described as emulating the keypad 232 of FIG 8. Thus his emulated keypad would be rotated for left-handed use.

Independent claims 10 and 17 recite a projection array that is equally usable with a right or left hand without rotation or reversal of the array. Support for this amendment and for the hand grip details in new claim 17 are found in Applicant's FIGs 1-3 and on page 7, line 7 through page 8, line 19 of the specification. Kfoury's keypad physically rotates to adapt between right or left-handed use. See Kfoury's left-handed orientation in FIG 2, his right-handed orientation in FIG 3, and his paragraph [0038] describing why his keypad is not equally usable with a right or left hand without rotation.

Claims 9, 10, and 18 recite displaying a visual representation of each pressed projection in a position on a screen corresponding to the location of the pressed projection relative to the other projections. There is a major advantage to this feature. Many people with poor vision cannot read numbers on a small screen, but they can perceive spatial relationships. This includes people with macular degeneration uncorrectable by lenses, and people with myopia or presbyopia who avoid wearing corrective lenses in social environments. The claimed display feature allows such people to use a cell phone or other hand-held device. Thus, there is a major advantage in this feature that is not available in the cited art.

## CONCLUSION

For the above reasons, neither Kfoury alone nor the proposed combination of Kfoury with Liebenow, supports a 35 USC 102 or 35 USC 103 rejection of claims 1, 9, 10, 17, or 18. The remaining dependent claims should be allowable for including all the limitations of one of the independent claims 1, 10, or 17. Therefore, Applicant respectfully requests allowance of this application.

Respectfully,

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